

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEP 15 2011

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

No. 11 CR 497

vs.

FABRIEAL DELANEY,
a/k/a "Face"

Violations: Title 18, United States Code,
Sections 1591(a)(1), (a)(2), (b)(1), and (d)
and 2423(a)

JUDGE DARRAH

COUNT ONE

MAGISTRATE JUDGE COLE

The SPECIAL JULY 2010 GRAND JURY charges:

Beginning no later than in or about August 2010 to at least in or about October 2010, at
Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, in and affecting interstate commerce, (1) knowingly recruited, enticed,
harbored, transported, provided, obtained, and maintained by any means a person, namely
Victim 1, and (2) knowingly benefitted financially and by receiving anything of value from
participation in a venture which has engaged in recruiting, enticing, harboring, transporting,
providing, obtaining, and maintaining by any means Victim 1, knowing that means of force,
threats of force, fraud, and coercion, and any combination of such means would be used to cause
Victim 1 to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a)(1), (a)(2) and (b)(1).

COUNT TWO

The SPECIAL JULY 2010 GRAND JURY charges:

In approximately September 2010, at Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, in and affecting interstate commerce, (1) knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim 2, a minor who had attained the age of 14 but was under the age of 18, and (2) knowingly benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim 2, (1) knowing that means of fraud and coercion and any combination of such means would be used to cause Victim 2 to engage in a commercial sex act, and (2) knowing and in reckless disregard of the fact that Victim 2 had not attained the age of 18 years and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(1), and 2.

COUNT THREE

The SPECIAL JULY 2010 GRAND JURY further charges:

In or about September 2010 at Joliet, in the Northern District of Illinois, Eastern Division,

and elsewhere,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, knowingly transported Victim 2, a minor under the age of 18, in interstate commerce, from the State of Michigan to the State of Illinois, with the intent that Victim 2 engage in prostitution;

In violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT FOUR

The SPECIAL JULY 2010 GRAND JURY charges:

Beginning no later than in or about March 2011 to on or about July 21 and 22, 2011, at Tinley Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, in and affecting interstate commerce, (1) knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely Victim 2, a minor who had attained the age of 14 but was under the age of 18, and (2) knowingly benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim 2, (1) knowing that means of fraud and coercion and any combination of such means would be used to cause Victim 2 to engage in a commercial sex act, and (2) knowing and in reckless disregard of the fact that Victim 2 had not attained the age of 18 years and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a)(1), (a)(2), (b)(1), and 2.

COUNT FIVE

The SPECIAL JULY 2010 GRAND JURY charges:

In or about July 2011, at Tinley Park, in the Northern District of Illinois, Eastern Division,
and elsewhere,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, in and affecting interstate commerce, (1) knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 3, a minor who had attained the age of 14 but was under the age of 18, and (2) knowingly benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim 3, knowing and in reckless disregard of the fact that Victim 3 had not attained the age of 18 years and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a)(1), (a)(2), (b)(1), and 2.

COUNT SIX

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about July 21 and 22, 2011, at Tinley Park, in the Northern District of Illinois, Eastern
Division, and elsewhere,

FABRIEAL DELANEY
a/k/a "Face,"

defendant herein, knowingly transported Victim 2, a minor under the age of 18, in interstate
commerce, from the State of Michigan to the State of Illinois, with the intent that Victim 2 engage
in prostitution;

In violation of Title 18, United States Code, Section 2423(a) and 2.

COUNT SEVEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about July 21 and 22, 2011, at Tinley Park, in the Northern District of Illinois, Eastern
Division, and elsewhere,

FABRIEAL DELANEY
a/k/a "Face,"

defendant herein, knowingly transported Victim 3, a minor under the age of 18, in interstate
commerce, from the State of Michigan to the State of Illinois, with the intent that Victim 3 engage
in prostitution;

In violation of Title 18, United States Code, Section 2423(a) and 2.

COUNT EIGHT

1. On or about November 1, 2010, the SPECIAL JULY 2010 GRAND JURY, sitting in Chicago, Illinois, commenced grand jury proceeding 10 GJ 1146 into, among other things, allegations of violations of Title 18, United States Code, Sections 1591(a) (sex trafficking of children or by force, fraud or coercion) and 2423(a) (transportation of minors with intent to engage in criminal sexual activity). The Grand Jury proceeding continued up to and including the date of the return of this indictment.

2. On July 22, 2011, a criminal complaint was filed, charging Defendant FABRIEAL DELANEY, a/k/a "Face," in *United States v. Fabrieal Delaney*, 11 CR 497, with a violation of Title 18, United States Code, Section 2423(a).

3. On July 22, 2011, defendant FABRIEAL DELANEY, a/k/a "Face," became aware of the criminal complaint in *United States v. Fabrieal Delaney*, 11 CR 497, which charged defendant DELANEY with violating Title 18, United States Code, Section 2423(a).

4. In approximately August 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, obstructed, attempted to obstruct, and in any way interfered with and prevented the enforcement of Title 18, United States Code, Section 1591(a); in that

(a) defendant DELANEY contacted Victim 2 and directed Victim 2 to tell federal law enforcement that other individuals caused Victim 2 and Individual A to "work" and "solicit," meaning engage in commercial sex acts, when, in fact, as defendant well knew, defendant caused Victim 2 and Individual A to engage in, and to attempt to engage in, a commercial sex acts;

(b) defendant DELANEY contacted Victim 2 and directed Victim 2 to recant Victim 2's statements to federal law enforcement and to the grand jury;

(c) defendant DELANEY contacted Victim 2 and directed Victim 2 to tell federal law enforcement that Victim 2 and Victim 3 had did not tell DELANEY that they were minors under the age of 18, when, in fact, as defendant well knew, Victim 2 and Victim 3 had told defendant that they had not attained the age of 18; and

(d) defendant DELANEY contacted Individual A and directed Individual A to falsely report to federal law enforcement and to the grand jury that, with regard to their travel on July 21 and 22, 2011 from Michigan to Tinley Park, Illinois, Victim 2, Victim 3, and Individual A were "going there to dance, that's all," when, in fact, as defendant well knew, defendant did intend for Victim 2, Victim 3, and Individual A to engage in commercial sex acts on or about July 21 and 22, 2011;

In violation of Title 18, United States Code, Section 1591(d) and 2.

FORFEITURE ALLEGATION

THE SPECIAL JULY 2010 GRAND JURY further charges:

1. The allegations contained in Counts One and Two of this Indictment are realleged and incorporated by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1594.

2. As a result of his violations of Title 18, United States Code, Section 1591 and 2,

FABRIEAL DELANEY,
a/k/a "Face,"

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d)(1), any and all right, title, and interest defendant has in any and all property, real or personal, used or intended to be used in any manner or part to commit and to facilitate the commission of the aforesaid violations.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 1594(d)(1) include, but are not limited to, the Compaq Presario, serial number CNF0213DZG;

All pursuant to Title 18, United States Code, Section 1594(d).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY